

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC.,
et al.,

Counterclaim Plaintiffs,

v.

TONIA HADDIX,

Counterclaim Defendant.

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No. 4:16-CV-2163-CDP

**MOTION FOR EXTENSION OF TIME TO RESPOND TO COUNTERCLAIM
PLAINTIFFS' SIXTH MOTION FOR AN ORDER TO SHOW CAUSE**

Counterclaim Defendant Tonia Haddix (“Haddix”), by and through undersigned counsel, respectfully requests that this Court grant her a brief extension of time to file a response to Counterclaim Plaintiffs’ sixth motion for an order to show cause (Doc. 392). Specifically, Haddix respectfully requests an additional 14 days within which to respond.

On October 30, 2024, Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. (“PETA”) and Angela Scott (collectively, “Counterclaim Plaintiffs”) filed a “motion for an order to show cause why Counterclaim Defendant Tonia Haddix and her accomplices should not be held in civil contempt[.]” (Doc. 392).

The factual allegations included in support of the motion by Counterclaim Plaintiffs largely stem from “the airing of a massively popular docuseries on HBO containing evidence establishing a *prima facie* case that Defendant Tonia Haddix, as well as other accomplices, engaged in a knowing conspiracy to suborn and commit perjury, and to violate several of this Court’s orders.” (Doc. 392 at 1). Included with the motion are 20 exhibits, one of which is a declaration of PETA General Counsel for Captive Animal Law Enforcement, Brittany Peet, which itself includes an

additional 19 exhibits. (*See* Doc. 392-1).

Haddix respectfully requests additional time sufficient to allow undersigned counsel to fully evaluate Counterclaim Plaintiffs' claims and the evidence submitted in support of those claims. Additionally, undersigned counsel was required to travel to the United States District Court for the District of Minnesota for a hearing on November 7, 2024, and undersigned counsel is presently in the United States District Court for the Western District of North Carolina for a hearing today, November 13, 2024.

This request is not intended to unnecessarily delay or hinder the proceedings but is, instead, merely made so as to allow undersigned counsel sufficient time to effectively evaluate Counterclaim Plaintiffs' claims and to prepare a response thereto. Alternatively, if warranted, Haddix may respectfully request a stay of these proceedings pending the resolution of an ongoing federal criminal investigation of Haddix which appears to be based on largely the same allegations that form the basis of Counterclaim Plaintiffs' motion.

Based on the foregoing, Haddix respectfully requests that this Court grant this motion, permitting her an additional 14 days to respond to Counterclaim Plaintiffs' sixth motion for an order to show cause or to file a motion to stay these proceedings, and for such other and further relief as this Court deems necessary and proper under the circumstances.

Respectfully submitted,

Margulis Gelfand, LLC

/s/ Justin K. Gelfand

JUSTIN K. GELFAND, #62265MO

7700 Bonhomme Ave., Ste. 750

St. Louis, MO 63105

Telephone: 314.390.0234

Facsimile: 314.485.2264

justin@margulisgelfand.com

Counsel for Haddix

Certificate of Service

I hereby certify that the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties of record.

/s/ Justin K. Gelfand
JUSTIN K. GELFAND, #62265MO
7700 Bonhomme Ave., Ste. 750
St. Louis, MO 63105
Telephone: 314.390.0234
Facsimile: 314.485.2264
justin@margulisgelfand.com
Counsel for Haddix